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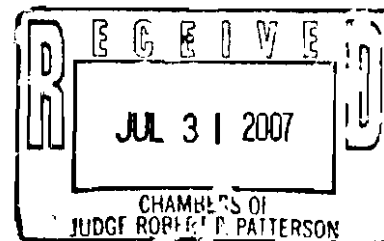
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July 31, 2007

BY HAND

THE HON. ROBERT P. PATTERSON
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Chambers 2550
New York, New York 10007



Re: **SDNY Case No's:**

07 Civ. 959 (RPP)

07 Civ. 2562 (RPP)

07 Civ. 3104 (RPP)

07 Civ. 6008 (RPP)

Indemnity Ins. Co. of N.
Am. v. C.U. Transp.,
Inc., & Related Actions
M/V EASLINE TIANJIN
Our File No.: 12/3368

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/1/07

MEMO

ENDORSE

Honorable Sir:

We represent defendant KAWASAKI KISEN KAISHA LTD. (K-LINE) in the above-referenced actions. Pursuant to Your Honor's individual rules of practice and the July 31, 2007 deadline previously set by the Court, we enclose courtesy copies of K-LINE's Notice of Motion to dismiss pursuant to the forum-selection agreement contained in the K-LINE bill of lading, as well as a supporting Declaration and Memorandum of Law.

However, we have learned that additional claims, including, but perhaps not limited to, the action now pending under 07 Civ. 6008, have been or shortly will be filed in connection with this loss, and K-LINE's time to answer them has not yet even run. But we believe the resolution of the additional claims, as far as the United States proceedings are concerned, would likely be guided by the Your Honor's decision on the enclosed motion, in any event.

Accordingly, we request that K-LINE's time to move with respect to venue in the new claims be extended until 30 days from the time of the Court's ruling on the pending motion.

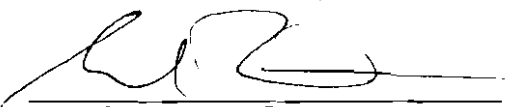
*Application
granted
So ordered
Robert P. Patterson
7/31/07 USDC*

We thank the Court for its consideration.

Respectfully submitted,

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By:


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